

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**IN RE:**

**TEXAS ENTERPRISES, LLC  
D/B/A BLUEBONNET ELITE  
ASSISTED LIVING  
DEBTOR,**

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**CASE NO. 15-20032**

**CHAPTER 11**

**WITNESS/EXHIBIT LIST FOR  
MUFG UNION BANK, N.A. FOR HEARING ON MOTION FOR VALUATION**

**TO THE HONORABLE  
UNITED STATES BANKRUPTCY JUDGE:**

COMES NOW, MUFG UNION BANK, N.A., ("Union Bank") intends to use the following exhibits in connection with the Motion for Valuation filed by Debtor.

**I. EXHIBITS**

- A. Proofs of Claim #5 and #10 filed by Union Bank and all exhibits attached thereto.
- B. Plan of Reorganization and Disclosure Statement filed by Debtor, dated October 28, 2015 and all exhibits attached thereto.
- C. Appraisal Report of Blue Bonnet Elite Assisted Living 102 Floyd Street, Naples, Texas 75568 prepared by Daniel T. Wilch, MAI, Senior Appraiser with Aaron Brown & Associates, Inc. and all exhibits attached thereto.
- D. Memorandum of Appraisal Review-Desk Review, Dated November 3, 2015 and prepared by Daniel T. Wilch, Senior Appraiser with Aaron Brown & Associates, Inc. and all exhibits attached thereto.
- E. PROFESSIONAL QUALIFICATIONS OF Daniel T. Wilch, MAI.
- F. All Exhibits listed in Debtor's List of Exhibits to be presented by Debtor at hearing on Motion for Valuation Debtor, including but not limited to the Appraisal Report by The Appraisal Firm of Texas, Inc. dated July 15, 2015.

## II. WITNESSES

1. Daniel T. Wilch, MAI, Aaron Brown & Associates, Inc, 2765 12<sup>th</sup> Street S.W. Salem, Oregon 97302, 503 363 5969.
2. Witness listed by Debtor and designated to testify at the hearing on Motion for Evaluation filed by Debtor, including but not limited to Debtor's representative and Chris Diamond.

Respectfully submitted,

**ANDERSON VELA, L.L.C.**

/S/ RICHARD ANDERSON

Richard E. Anderson

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Dallas, Texas 75251

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**COUNSEL FOR UNION BANK**

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing has been this date served electronically or mailed to the parties listed below.

### **Debtor**

Texas Enterprises, LLC  
d/b/a Bluebonnet Elite Assisted Living  
102 Floyd St.  
Naples, Texas  
75568

***Via Regular Mail***

### **Debtor's Attorney**

Joshua P. Searcy  
Searcy & Searcy,  
P.C.  
P.O. Box 3929  
Longview, Tx 5606

***Via Electronic  
Service***

**US TRUSTEE**

Marcus Salitore  
US Trustee Office  
110 N. College  
Ave., Room 300  
Tyler, TX 75702

***Via Electronic  
Service***

Date: November 11, 2015

/s/ Richard E. Anderson  
RICHARD E. ANDERSON